



**BACKCOUNTRY
HUNTERS & ANGLERS
NEVADA**

Jamie Rodriguez
Washoe County
1001 East 9th Street Reno, NV 89512

Dear Ms. Rodriguez,

Please accept these comments from the Nevada Chapter of Backcountry Hunters & Anglers (NV BHA) expressing both support and concerns with portions of Washoe County's efforts toward public lands conservation, while providing for urban needs. We recognize that these comments are tardy, but we lacked adequate timely notice to give sufficient deliberation to the thoughts we provide below.

Backcountry Hunters & Anglers seeks to ensure North America's outdoor heritage of traditional hunting and fishing opportunities in a natural setting, through education and work on behalf of wild public lands and waters. Washoe County has an abundance of public lands. To our members, adequate protection of these wildest portions of our iconic American Western landscapes is crucial to ensuring our quality of life and our chosen traditional form of dispersed recreation as hunters and anglers.

We recently learned that a stakeholder meeting with sportsmen (note: sportsmen is meant to include women:-) was held in November. As NV BHA is a board member of the Coalition for Nevada's Wildlife, we were reassured that Chairman Larry Johnson was able to attend that meeting. That said, NV BHA submitted comments to you on 2/28/2018 that, while much in agreement with the Coalition comments, differed in some particular aspects with that of the Coalition. As such, we were disappointed not to have been included in what should have been a roundtable inclusive of the subtle differences of sportsmen views. Although importantly close on most issues, we are not a homogenous entity. It leads us to wonder if you had read and digested what we had to say back in 2018?

Exact bill language will be of critical import to our final comments. Our comments on the bill as currently proposed will change as deemed necessary once specific language is forthcoming

The following are general comments & concerns re: process:

The process for information gathering leading to decisions is flawed from the outset in the following ways:

* The projected proposal completion date of mid-2020 is highly unrealistic and would truncate vitally important deliberations toward consensus, especially re: the Conservation portion of this proposed bill.



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- * Due to our exclusion from the sportsmen meeting, we haven't assurance that the separate stakeholder group meetings held to date have truly been inclusive of all views within each group.
- * There is no assurance given that a facilitated true stakeholder group of all interests will be convened. NV Public Lands (PL) bills to date have each had some form of a broad umbrella group in attempt toward consensus. We suspect all stakeholders who were involved would agree: to date, the Pine Forest example is the gold star for appropriate process. The 2 current PL bills in Congress at the moment, Pershing & Douglas Counties, had similar processes, both entailing literally years of work.
- * Past PL bill processes were not led by the counties. The counties occupied stakeholder seats and our Congressional delegation essentially validated & oversaw the process. The counties passed resolutions: first to support a stakeholder effort, then, at end of the process, to approve of the consensus PL bill proposals.
- * Public lands belong to all citizens of the US as our birthright "savings account" for the future to retain the rich resources & recreation opportunities of our frontier heritage for all generations to come. All citizens, valuing this heritage of lands held in common, have a right to be a part of this decision-making process, not just the citizens of Washoe County. The process should appropriately be guided by our Congressional delegation and not by Washoe County, nor cities of Reno & Sparks.

The following are our comments & concerns within the 2 portions of the proposed bill.

Disposal

Given the history of county-specific lands bills in Nevada including a balance of conservation protections and economic development, we understand and support the purpose & need for targeted conveyance of federally-managed public lands for community benefit.

The proposed conveyance of Bedell Flats to allow groundwater injection by TMWA, while laudable in purpose, the scale, size of PL withdrawal and potential impact on public access are of continuing concern.

We support stringent wildlife protections & exclusions for the Virginia Range, Peterson & Dogskin Mountains, and the Sand Hills, due to the certainty of negative impacts to mule deer, pronghorn and other wildlife. They must be protected from disposal or transfer, as is appropriate given their high wildlife values. Significant surrounding areas must be included in order to protect the entire winter range and migratory routes.

We emphatically do not support any portion of the Pahrahs to be included within the disposal boundary, even were a "no development" restriction applied. The Pahrahs comprise public values of rich cultural, wildlife and wildland resources. These resources are elevated in both value and threat of negative impact by virtue of their closeness to our expanding urban areas. As such, they need extra protection rather than placed within the disposal boundary.

We do recognize a perceived need for a road across the south end of the Pahrahs connecting to Highway 80. It is impossible to imagine how the extent & richness of all the cultural sites could be protected in such an impactful development. NDOW & sportsmen have expended thousands of dollars & years of time to provide wildlife enhancement projects along the proposed route, all of which would be diminished, even eliminated, by the intrusion of a road, traffic sight and sounds.



Surely, rather than blasting through that highly valuable beautiful section, there can be creative thinking as to how to ease the increasing traffic to the tech areas, such as is done in other urban areas (& even our NV mine-sites): company vans for employees, Reno/Sparks buses to those areas, incentives for car-poolingetc. There must be many existing models as to how to solve this problem creatively without sacrificing such precious public resource values so close to our urban areas.

Last and most importantly, we question why any of the areas of concern noted above need be included within the disposal boundary.

We request, for public consideration, that a purpose & need be outlined for each specific area.

Conservation/Wilderness

As our above comments on the process conclude: an impossibly short time frame is proposed for making decisions regarding WSAs and other areas with Wilderness characteristics. To be a successful, credible process it needs to be extremely deliberative, site-specific, collaborative, considering many varied options for resolving issues, for the following reasons:

*As public lands, the disposition of these areas is of national interest, as well as to our urban recreationists in the county. As such, our Senators, as in other NV public lands bills, need to play a vital leadership role in a process that takes all the time needed to come to collaborative conclusions.

* The WSAs & other primarily roadless areas are the last of Washoe County public lands that remain essentially primitive. As such they are a fast diminishing resource. Many believe that they will always remain that way even without any special designation. Perhaps they will remain so for our lifetime, but we have only to look at the areas in Clark county, primitive perhaps even up to 30 years ago, but are now over-run with recreationists “loving them to death”. We need to recognize the weighty fact that we are charged with making decisions for generations far into the future.

* Proposals for disposition of these areas should rightfully be made by the Pine Forest process model: a broad stakeholder group, facilitated by a professional who is familiar with the areas, the collaborative process and the language of the Wilderness Act as well as the NDOW/BLM MOU. A number of meetings would be required.

*The process should take the time that is needed to allow site-specific field trips & on the ground “problem-solving” that are owed areas that have been protected almost 4 decades for their primitive qualities. Decisions must not be made lightly, nor by just drawing lines on a map.

We acknowledge and are sympathetic to Wilderness wildlife management concerns brought forth by other sporting organizations, particularly inconsistent policy interpretations as to the allowability of mechanized firefighting, burn area recovery and re-seeding, spring restoration, mechanized vegetation treatments, and certain wildlife research methods. However, we recognize that many of these issues are often not the result of a protective designation per se, but rather from inadequate authority delegation within our NV BLM, faulty decision making, inconsistent application of and/or interpretation of the Wilderness Act and/or the BLM/NDOW MOU.



Our organization has engaged the relevant agencies in attempts to resolve these issues. We view the Washoe Public Lands legislative effort as an opportunity to further this effort and seek solutions for the benefit of wildlife.

In our view, wildlife management problems associated with Wilderness pale in comparison to the threats posed to our wild lands in northern Washoe County by increasing off road vehicle use (creating yet more unauthorized routes, risk of fire & weeds), energy and mineral development, pipeline and transmission lines and other potential industrial uses. In consideration of those threats, we are hopeful that any Washoe public land legislation will provide for appropriate resolution of WSAs and wilderness quality lands to significantly protect their wildland qualities into the future. Those with highest remote, primitive and resilient qualities should be designated Wilderness, the rest must receive alternative protective designations, such as “Backcountry,” “Wildlife Management,” or “National Conservation Area” designations, offering robust travel management, mineral withdrawal, and other protections, while providing greater management flexibility and certainty for the benefit of wildlife.

After engaging in a deliberative process as described above, we can make a final recommendation of which protective designation is appropriate for each of these qualifying areas: Fox Range, Granite-Banjo, Buffalo Hills Complex, Wall Canyon, Massacre Rim, Sheldon Contiguous and areas within the Sheldon Refuge.

Conclusion

Our Nevada members have strong connections to all of the areas referenced in this letter. Whether it's hunting sage-grouse on the tablelands of Massacre Rim, or packing out harvested deer from high up in the Granites on foot, hiking in the Pahrads with our families, our members treasure the wild public lands of Washoe County and support efforts to protect those lands and the experiences they provide for future generations.

We appreciate the complexity of issues you face as you attempt to formulate your recommendations for legislation. It is our hope you will take our process concerns to heart, push the pause button, reconfigure this process to form an appropriate stakeholder group and allow for as much time is needed to make these weighty decisions. We hope you'll consider the tremendous conservation and recreation opportunities identified in this letter as you proceed with your work. Please let us know how we may further engage in your process.

Thank you for this opportunity to comment,

Karen Boeger
Conservation Policy Chair
Backcountry Hunters & Anglers, Nevada Chapter

